

Hearing Date: October 4, 2017, 9:30 a.m. (Atlantic Standard Time)

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

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In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

PROMESA
Title III

as representative of

Case No. 17-BK-03283-LTS

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

(Jointly Administered)

Debtors.¹

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In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

PROMESA
Title III

as representative of

Case No. 17-BK-4780-LTS

PUERTO RICO ELECTRIC POWER AUTHORITY,

(Joint Administration Requested)

Debtor.²

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**JOINDER OF INTERNATIONAL UNION, UNITED AUTOMOBILE, AEROSPACE AND
AGRICULTURAL IMPLEMENT WORKERS OF AMERICA (UAW), SERVICE
EMPLOYEES INTERNATIONAL UNION, AND AMERICAN FEDERATION OF
TEACHERS, AFL-CIO TO AFSCME'S REPLY TO OPPOSITION TO MOTION OF
INTERAMERICAS TURNKEY, INC. TO REVIEW AND STAY [DKT. ENTRY NO. 1326]**

¹ The Debtors in these title III cases, along with each Debtor's respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808), and (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474).

² The last four (4) digits of PREPA's federal tax identification number are 3747.

The International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (UAW), Service Employees International Union, and the American Federation of Teachers, AFL-CIO (together, the “Unions”) respectfully submit this joinder (the “Joinder”) in support of *AFSCME’s Reply to Opposition to Motion of Interamericas Turnkey, Inc. to Review and Stay* (the “Reply”) [Docket Entry No. 1326]. In support of their Joinder, the Unions respectfully state as follows:

THE UNIONS AND THEIR INTEREST

1. Collectively, the Unions’ membership includes tens of thousands of employees of the Government of the Commonwealth of Puerto Rico, employees whose livelihoods would be affected directly by the furloughs at issue in this action.

JOINDER

2. The Unions agree with AFSCME, for the reasons stated in its Reply, that the Court should not resolve the Interamericas Turnkey, Inc. furlough motion based on PROMESA Section 305. Further, the Unions join in and incorporate by this reference as their own the reservations of rights stated by AFSCME in its Reply.

CONCLUSION

3. For the foregoing reasons, the Unions respectfully join in AFSCME’s Reply.

Dated: September 18, 2017

Respectfully submitted,

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-and-

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